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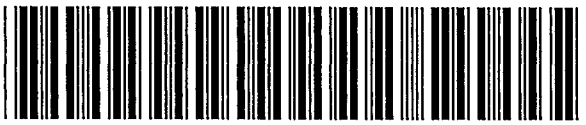


DocumentID NONCD0002847

Site Name DISTRICT 12 HEADQUARTERS-NCFS

DocumentType Correspondence (C)

RptSegment 1

DocDate 1/4/2011

DocRcvd 1/4/2011

Box SF3052

AccessLevel PUBLIC

Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

DocCat FACILITY

North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

January 4, 2011

Mr. Allen Williams
NCDENR, Division of Forest Resources
P.O. Box 29581
Raleigh, NC 27626-0581

Re: **Review of Semi-Annual Natural Attenuation Groundwater Sampling Report, Site Cleanup Questionnaire & NFA Request**
District 12 Headquarters
NC Highway 273, Gaston County, NC
IHSB Incident No.NONCD0002847 & UST Incident Nos. 20181(Active) & 11184(Close)

Dear Mr. Williams:

The Division of Waste Management (DWM) – Superfund Section's - Inactive Hazardous Sites Branch (Branch) has reviewed the September 29, 2010, "Semi-Annual 2010 Natural Attenuation Groundwater Sampling Report" (Semi-Annual 2010) and "Site Cleanup Questionnaire" submitted by One Environmental Group for the subject Site, located at NC Highway 273, Gaston County, North Carolina (Site). In addition to the petroleum compounds being regulated at your Site by the DWM's Underground Storage Section, the Branch has regulatory jurisdiction over non-petroleum hazardous substances detected in supply wells adjacent to your Site. Based on this report and our file records, the Branch has made a determination on how to further proceed with this Site.

The historical monitoring reports and relevant documentation indicated that your Site may have been contaminated by one or more hazardous substances. Based on the review of the submitted reports, the following compounds were detected in supply wells located at 511 (WSW-1 and WSW-2), 517 (WSW-4), and 516 (WSW-5) Flat Rock Cemetery Road. The compounds include: acetic acid, 1,2,3 -trichloro-1-propene, 4-hydroxy-4-methyl-2-pentanone, 5-mehyl-1-hepten-4-ol, caprolactam, Bis(2-ethylhexyl)phthalate, and lead. Various compounds were also detected in onsite monitoring wells MW-A1, MW-3, MW-4, MW-7, MW-8, MW-10, and MW-12. Detections of Cadmium at MW-7, Chromium at MW-A3, Lead at WSW-2, and Bis(2-ethylhexyl)phthalate WSW-4 were above the state's 15A NCAC 2L groundwater quality limits and the Federal Drinking Water Standards (USEPA MCL). These are groundwater classifications and standards which are regulatory limits for chemicals in groundwater. Detections of Manganese at MW-A1, MW-4, MW-7, and MW-10, and Selenium at WSW-2 were also above the 15A NCAC 2L and/or secondary USEPA MCL standards.

Given the nature of the compounds detected at the Site and surrounding water supply wells, the Branch requested that confirmation samples be collected from area water supply wells from both the wellhead and at a household tap at WSW-1, WSW-2, WSW-4 and WSW-5, and from the onsite monitoring wells from MW-A1, MW-7 and a up-gradient monitoring well. Based on the review of additional data, the Branch has determined that the elevated concentrations of chromium, copper, manganese, nickel and lead in groundwater are caused by naturally occurring conditions at this Site. Moreover, the confirmation samples collected from the area water supply wells from the wellhead and at the household tap from WSW-1, WSW-2, and WSW-4 demonstrated that lead concentrations are related to household plumbing issues as lead concentrations are greater at the household tap.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115
Phone: 704-663-1699 \ FAX: 704-663-6040 \ Internet: www.wastenotnc.org

The Branch has determined that the metal detections in groundwater were caused by naturally occurring conditions at this Site. The groundwater analytical samples collected at the Site did not reveal continued detections or exceedances of the state's 15A NCAC 2L groundwater quality standards for the above compounds of concern. **This Site has been transferred to the "No Further Action" category in the Inactive Hazardous Sites Branch's inventory of sites. No further remedial action will be required unless the Department later determines, based on new information or information not previously provided to the Department, that the site has not been remediated to current standards or that the Department was provided with false or incomplete information.**

Please note that additional investigation or remediation related to petroleum compounds may still need to be conducted in accordance with the Division of Waste Management - Underground Storage Tank (UST) Section's regulations and guidance documents. Any future investigation or remediation reports related to petroleum substances will be the responsibility of the Division of Waste Management's UST Section and should be forwarded to the attention of Brad Newton of the UST Section in the Mooresville Regional Office.

If you have additional questions, please contact me at (704) 663-1699 or by email at miguel.alvalle@ncdenr.gov .

Sincerely,

Miguel A. Alvalle,
Hydrogeologist
Department of Environment and Natural Resources
Division of Waste Management
Superfund Section - Inactive Hazardous Sites Branch

Cc: Brad Newton of the Division of Waste Management UST Section- MRO
David L. Gibson, Owner of WSW- 3 & 5 - P.O. Box 764, Mount Holly, NC 28120
Michael Cox, Owner of WSW-1, 2 & 4- P.O. Box 383, Mount Holly, NC 28120
Paul Mickler of One Environmental Group - 115 S. Saint Mary's Street, Raleigh, NC 27603

Print Form

Staff Name: Miguel Alvalle

Inactive Hazardous Sites Tracking Data Entry

Always enter ID# and site name. Otherwise, only enter new information/changes.

ID#: NONCD0002847 **Site Name:** NCDFS District 12 Headquarters

Site Address: 1933 Mountain Island Highway (Hw **Site City:** Mount Holly

Site County: Gaston

Process Code: [ ] **Residence on Site?** Yes ☐ No ☒

Distance to Nearest Water Source Well: > 1/4 mile ☒ No Information ☐ < 1/4 mile ☐

Distance to SW Intake (Drinking): > 1/4 mile ☐ No Information ☐ < 1/4 mile ☐

Coordinates: Latitude: 35.33073 Longitude: -80.99726

[NAD83, Decimal-degrees-fifth order]

Geolocation Method:

- ☐ Registered Land Surveyor
- ☐ GPS Survey Grade Corrected
- ☐ GPS Survey Grade Not Corrected
- ☐ GPS Mapping Grade Corrected
- ☐ GPS Mapping Grade Not Corrected
- ☐ GPS Recreational Grade
- ☒ On Screen Placement on Georeferenced Map
- ☐ Hard Copy Map
- ☐ Geocoding (address match)
- ☐ Supplied by others (unsubstantiated)
- ☐ Unknown

Inventory Categories: *(*If "Yes," site cannot be in more than one category.)*

SPL*	☐	SPL SCORE	
Voluntary (AA)*	☐		
Evaluation Pending*	☐		
No Further Action*	☒		
NFA - Restricted Use*	☐		
Non-HS Site - Open	☐		
Non-HS Site - NFA	☐		
Non-HS Site - NFA Restricted Use	☐		

Select these categories only if agency addressing all site contamination.

Solid Waste Lead	☐
Non-NPL EPA Superfund/DOD Lead	☐
NPL	☐
RCRA Non-TSD Lead	☐
TSD	☐
DRP Lead	☐
DSCA Lead	☐
UST Lead	☐
DWQ Lead	☐
Duplicate	☐

Contaminant Data: *(Based on laboratory detection.)*

	Groundwater	Soil	Surface Water	Sediment
Organics	☒	☐	☐	☐
Metals	☒	☐	☐	☐
Pesticides/Herbicides	☐	☐	☐	☐
Acids	☒	☐	☐	☐
Bases	☐	☐	☐	☐
Cyanide	☐	☐	☐	☐
Inorganics	☐	☐	☐	☐
Radioactive Constituents	☐	☐	☐	☐

Known/suspected Contamination (*Check only if no lab data*) ☐

Orders/AAs:

Instrument[1]	Docket #	Issued To (required if different from site name)	Medium/ Area Covered (default = entire site)	Effective Date	Instrument Withdrawn?	Work Completed Date	Staff Contact

1 - Instruments: AA-REC, Administrative Agreement, Assessment Order, Cleanup Order, Imminent Hazard Order, Public Nuisance Order, Recordation Order

Recorded Notices/DPLURs

Instrument (Enter DPLUR or Notice)	Property[2]	Date Recorded	Recorded By (Enter State or Owner) [Notice Only]	Replaces Previous Y/N	Annual Certification Date [DPLUR Only]	Date Canceled	Pursuant to Recordation Order Y/N [Notice Only]

2 - Enter owner's name. Add tract #s or other designation if multiple properties recorded for the same owner.

December 22, 2010

MEMORANDUM

TO: Hanna Assefa, Industrial Hygienist
Superfund Section, Inactive Hazardous Sites Branch (IHSB)

FROM: Miguel Alvalle, Hydrogeologist
Superfund Section, IHSB

RE: Health Risk Evaluation Request
Michael & Mary Cox
511 Flat Rock Cemetery Road, Mt. Holly
Gaston County, NC
Parcel ID#177751

One Environmental Group collected two samples from a potable well at the above reference location on September 10, 2010, from water supply well and the "house tap" at the above referenced location. WSW-2 was collected at the well head and WSW-2-House was collected from a faucet inside the house. IHSB requests a health risk evaluation and a recommendation for the continued use of this well. The following table summarizes the detected chemicals and the corresponding concentrations. The laboratory analytical reports associated with these samples are attached.

Location	Chemical	Units	Cox (09-10-10)
WSW-2 (Well head)	Copper	µg/L	60
	Lead	µg/L	<5 (BDL)
	Zinc	µg/L	60
WSW-2-House (Tap)	Copper	µg/L	84
	Lead	µg/L	**<25 (BDL)**
	Zinc	µg/L	71

BDL- below detection limit

Attachment- ESC Lab Sciences Report L478144

December 22, 2010

To: Miguel Alavalle, Hydrogeologist
Inactive Hazardous Sites Branch
Superfund Section

From: Hanna Assefa, Industrial Hygienist
Inactive Hazardous Sites Branch
Superfund Section

Re: Health Risk Evaluation
Michael and Mary Cox Well
517 Flat Rock Cemetery Rd
Mt. Holly, Gaston County
Parcel ID 17752

Two water samples were collected from the water supply well at the subject address on September 10, 2010. One sample was from the well head, and one sample was from a house spigot. All contaminants were detected below applicable standards. The standards used to determine if the water is suitable for drinking and cooking are the federal drinking water standards(USEPA MCL), or where there is no MCL, The North Carolina Groundwater Quality Standard (NC 2L).

If contaminant concentrations exceed the applicable standards for using the water for drinking and cooking, the contaminant concentrations are further analyzed to determine if the water is suitable for other household uses, such as showering, bathing, washing dishes, flushing toilets, and hand washing. **Therefore, based on this evaluation the water from this well can be used for drinking, cooking and all other purposes listed above.** The table below compares the detected contaminant concentrations with the applicable standards

Sample #	Contaminant	Well head Concentration ug/l	House Spigot Concentration ug/l	USEPA MCL ug/l	15A NCAC 2L ug/l
L478144-03	Copper	24	46	1,300	**
	Lead	ND	5.2	15	**
	Zinc	33	40	*	1,000

ug/l - Micrograms per liter.
*Not Available
**Not Applicable
ND – Not Detected

ONE Environmental Group

14 December 2010

Via UPS Ground (Tracking # 1Z2W43110393049563)
Mr. Miguel Alvalle
North Carolina Department of Environment and Natural Resources
Division of Waste Management – Inactive Hazardous Sites Branch
Mooresville Regional Office
610 East Center Avenue
Mooresville, NC 28115

RE: ***Site Cleanup Questionnaire***
North Carolina Division of Forest Resources – District 12 Headquarters
IHSB Incident #: NONCD0002847

Dear Mr. Alvalle,

On behalf of the North Carolina Division of Forest Resources (NCDFR), ONE Environmental Group of Carolina, PLLC (ONE) herein provides one (1) copy of the *Site Cleanup Questionnaire* for the NCDFR District 12 Facility located in Mount Holly, North Carolina (IHSB Incident #NONCD0002847). The North Carolina Department of Environment and Natural Resources (NCDENR) – Inactive Hazardous Sites Branch (IHSB) requested that this questionnaire be completed in a letter dated August 9, 2010.

Two (2) of the questions have yes answers and require further explanation as provided below:

- Question #1 – "Is the site located on or immediately adjacent to residential property, schools, day-care centers or other sensitive populations?"
    - Yes – The NCDFR District 12 Headquarters (site) shares a property boundary with two residences, 511 and 517 Flat Rock Cemetery Road. The attached Water Supply Well Map shows the location of the site and the residences.
- Question #5 – "Is site groundwater known to be contaminated?"
    - Yes – Monitoring well MW-A1 has historically had detections of Tetrachloroethene, Bis (2-thylhexyl) phthalate and Diethyl phthalate. However, in the most recent sampling event Tetrachloroethene was not detected, and Bis (2-thylhexyl) phthalate and Diethyl phthalate were detected at levels below their respective North Carolina 2L standard. Monitoring Well MW-12 had detections of acetic acid, 1,2,3-trichloro-1-propene, 4-hydroxy-4-methyl-2-penanone, 5-methyl-1-hepten-4-ol and

caprolactum reported in 2008. These compounds have not been detected in this well since the 2008 event.

The site was originally opened within the IHSD due to the detections of the aforementioned compounds in MW-12. These compounds have not been detected since 2008 and do not appear to be related to any current or historical activities associated with the NCDFR. Based on the current status of the groundwater at this site, ONE recommends closure of incident number NONCD0002847 within the IHSB. The site currently has an open incident (#20181) with the Underground Storage Tank Section, groundwater monitoring will continue to be monitored under this incident and the IHSB will be notified if new impacts to groundwater are discovered during future sampling events.

ONE appreciates the opportunity to work with the North Carolina Department of Environment and Natural Resources (NCDENR) on this important project. Should you have any questions, please do not hesitate to contact me at (919) 699-7347.

Respectfully submitted,
ONE Environmental Group of Carolina, PLLC

Eli Holland, P.G.
Principal

Enclosures: Site Cleanup Questionnaire
Water Supply Well Map

cc: Robert Gron, NCDENR Division of Forest Resources

Site Cleanup Questionnaire

Remediating parties interested in volunteering should prepare this form with the assistance of an environmental consultant. All cooperative parties are eligible for Branch-approved remedial actions. Answer all questions, based on current information, and provide writtendescriptions where needed.

NCDENR Site Name, City and County **District 12 Headquarters, Mount Holly, Gaston County**

1. Is the site located on or immediately adjacent to residential property, schools, day-care centers or other sensitive populations? ☒ Y ☐ N
   If yes, please explain on a separate page.
2. What is the distance (from site property line) to the nearest residence, school or day-care center? Please attach a map showing the site and nearest residence, school or daycare center. Adjacent
3. Is the site completely surrounded by a locked fence? ☒ Y ☐ N
   If no, please explain security measures at the site on a separate page.
4. Are site surface soils known to be contaminated? ☐ Y ☒ N
   If yes, or unknown, describe briefly on a separate page.
5. Is site groundwater known to be contaminated? ☒ Y ☐ N
   If yes, or unknown, describe briefly on a separate page.
6. Is site sediment or surface water known to be contaminated? ☐ Y ☒ N
   If yes, or unknown, describe briefly on a separate page.
7. Has groundwater contamination affected any drinking water wells? ☐ Y ☒ N
   If yes, or unknown, please explain on a separate page.
8. What is the distance to the nearest downgradient drinking water well? > 1500 ft
9. What is the distance to the nearest downstream surface water intake? > 1500 ft
10. Are hazardous vapors, air emissions or contaminated dust migrating into occupied residential, commercial or industrial areas? ☐ Y ☒ N
    If yes, or unknown, please explain on a separate page.
11. Have hazardous substances known to have migrated off property at concentrations in excess of Branch unrestricted-use remediation goals? ☐ Y ☒ N
    If yes, or unknown, please explain on a separate page.
12. Has the local community expressed concerns about contamination at the site? ☐ Y ☒ N
    If yes, or unknown, please explain on a separate page.
13. Based on current information, are there any sensitive environments located on the property (sensitive environments are identified in the Remedial Investigation Work Plans section of the IHSB " Guidelines forAssessment and Cleanup" at http://portal.ncdenr.org/web/wm/sf/sfavailabledocs)? ☐ Y ☒ N
    If yes, or unknown, please explain on a separate page.

Environmental Consultant Certification Statement

After first being duly sworn or affirmed, I, Eli Holland, hereby state that: I am over the age of eighteen, I am competent to make this certification based upon my own personal knowledge and belief, and, to the best of my knowledge and belief, after thorough investigation, the information contained herein is accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.

(Signature) 12-14-2010 (Date)

Eli Holland
(Printed Name)

ONE Environmental Group of Carolina PLLC
(Printed Name of Environmental Consultant)

STATE OF NC

COUNTY OF Wake

I, Marilyn R. Ferguson, a Notary Public of said County and State, do hereby certify that Eli Holland personally appeared before me this day, produced proper identification in the form of NC DR. Lic, was duly sworn and/or affirmed, and declared that he or she is an environmental consultant for the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is accurate and complete, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal the 14 day of December, 2010.

Marilyn R. Ferguson
Notary Public (signature)

MARILYN R. FERGUSON
NOTARY PUBLIC
WAKE COUNTY, N.C.
OFFICIAL SEAL

My commission expires: 11/7/2015

14. Based on current information, has contamination from the site migrated into any sensitive environments? ☐ Y ☒ N

If yes, or unknown, please explain on a separate page.

15. Do site contaminants include radioactive or mixed radioactive and chemical wastes? ☐ Y ☒ N

If yes, or unknown, please explain on a separate page.

Remediating Party Certification Statement

After first being duly sworn or affirmed, I, ROBERT GRON, hereby state that: I am over the age of eighteen, I am competent to make this certification based upon my own personal knowledge and belief, and, to the best of my knowledge and belief, after thorough investigation, the information contained herein is accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.

ROBERT GRON — 12.14.2010
(Signature of Remediating Party Representative) (Date)

HEAD OF ENGINEERING - NC FOREST SERVICE
(Printed Name and Title of Remediating Party Representative)

NC FOREST SERVICE
(Printed Name of Company)

STATE OF North Carolina

COUNTY OF Wake

I, Michelle D. Collins, a Notary Public of said County and State, do hereby certify that Robert Gron personally appeared before me this day, produced proper identification in the form of DRIVERS License, was duly sworn and/or affirmed, and declared that he or she is the owner of the property referenced above or is a duly authorized agent of said owner and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is accurate and complete, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal the 14 day of December, 2010

Michelle D Collins
Notary Public (signature)

My commission expires: 12/28/2013

Michelle D Collins Notary Public Wake County, NC (OFFICIAL SEAL)

ONE Environmental Group

29 September 2010

Via UPS Ground (Tracking #1Z2W43110396112201)
Mr. Brad Newton
North Carolina Department of Environment and Natural Resources
Division of Waste Management – UST Section
Mooresville Regional Office
610 East Center Avenue
Mooresville, NC 28115

RE: ***2010 Semi-Annual Groundwater Monitoring Report***
North Carolina Division of Forest Resources – District 12 Warehouse
Incident #: 20181

Dear Mr. Newton,

On behalf of the North Carolina Division of Forest Resources (NCDFR), ONE Environmental Group of Carolina, PLLC (ONE) herein provides one (1) copy of the *2010 Semi-Annual Groundwater Monitoring Report* for the NCDFR District 12 Facility located in Mount Holly, North Carolina (Incident #20181). This report documents the groundwater sampling activities completed in September 2010 and provides conclusions and recommendations for the subject site.

ONE appreciates the opportunity to work with the North Carolina Department of Environment and Natural Resources (NCDENR) on this important project. Should you have any questions, please do not hesitate to contact me at (919) 699-7347.

Respectfully submitted,
ONE Environmental Group of Carolina, PLLC

Eli Holland, P.G.
Principal

cc: Miguel Alvalle, NCDENR Inactive Hazardous Sites
Robert Gron, NCDENR Division of Forest Resources

NCDENR
North Carolina Department of Environment and Natural Resources
Division of Waste Management
Dexter R. Matthews
Director

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

August 9, 2010

Mr. Allen Williams
NCDENR, Division of Forest Resources
P.O. Box 29581
Raleigh, NC 27626-0581

Re: **Review of Semi-Annual Natural Attenuation Groundwater Sampling Reports**
District 12 Headquarters
NC Highway 273, Gaston County, NC
IHSB Incident No.NONCD0002847 & UST Incident Nos. 20181(Active) & 11184(Close)

Dear Mr. Williams:

The Division of Waste Management (DWM) – Superfund Section's - Inactive Hazardous Sites Branch (Branch) reviewed a copy of the "Semi-Annual 2009 Natural Attenuation Groundwater Sampling Report" (Semi-Annual 2009) submitted by Froehling & Robertson, Inc. to the Underground Storage Tank Section, and a copy of the "Semi-Annual 2010 Natural Attenuation Groundwater Sampling Report" (Semi-Annual 2010) submitted by One Environmental Group for the subject Site (Site). In addition to the petroleum compounds being regulated at your site by the DWM's Underground Storage Section, the Branch has regulatory jurisdiction over non-petroleum hazardous substances detected in supply wells adjacent to your site. Based on these reports and our files, additional information is required before the IHSB can make a determination on how to further proceed with this Site, located at NC Highway 273, Gaston County, North Carolina.

The reports and relevant documentation indicate that your Site may have been contaminated by one or more hazardous substances. The Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310, et seq., applies to the Site. In addition, initial immediate actions may be required under 15A NCAC 2L, Groundwater Classifications and Standards. Depending on the contaminants involved and whether the contaminants have impacted or may impact groundwater quality and or human health you will be required to assess and cleanup the contamination under one or more cleanup authorities.

Based on the review of the submitted reports and relevant UST file records, the following compounds were detected in supply wells located at 511 (WSW-1 and WSW-2), 517 (WSW-4), and 516 (WSW-5) Flat Rock Cemetery Road. The compounds include: acetic acid, 1,2,3-trichloro-1-propene, 4-hydroxy-4-methyl-2-pentanone, 5-mehyl-1-hepten-4-ol, caprolactam, Bis(2-ethylhexyl)phthalate, and lead. Various compounds were also detected in onsite monitoring wells MW-A1, MW-3, MW-4, MW-7, MW-8, MW-10, and MW-12. Detections of Cadmium at MW-7; Chromium at MW-A3, Lead at WSW-2, and Bis(2-ethylhexyl)phthalate WSW-4 are above the state's 15A NCAC 2L groundwater quality limits and the Federal Drinking Water Standards (USEPA MCL). These are groundwater classifications and standards which are regulatory limits for chemicals in groundwater. Detections of Manganese at MW-A1, MW-4, MW-7, and MW-10, and Selenium at WSW-2 were also above the 15A NCAC 2L and/or secondary USEPA MCL standards.

Given the nature of the compounds detected at the Site and surrounding water supply wells, the Branch requests that confirmation samples be collected from area water supply wells and onsite monitoring wells. Water supply wells

samples at the wellhead and at a household tap should be collected from WSW-1, WSW-2, WSW-4 and WSW-5, and a water supply well located south and within 1500 feet of the Site. Monitoring well samples should be collected from MW-A1, MW-7, and a monitoring well that is up-gradient or has been historically non-detect for the compounds detected in the water supply wells. Additionally, field pH readings should be collected at all monitoring and water supply wells sample locations. Samples collected from the monitoring wells and water supply well wellheads (but not the tap samples) should be analyzed for Volatile and Semi-Volatile Organic Compounds by EPA method 8260B and 8270. "All sample locations should be analyzed for metals by an approved EPA method which is capable of achieving detection limits below the state's 15A NCAC 2L groundwater quality limit for all metals previous detected. The collection of water supply well tap sample locations and pH data may allow the Branch to determine if previous metals detections are found in groundwater or are a result of plumbing issues.

The Branch requests a map showing any existing on-site and surrounding private water supply (PWS) wells, a completed "Site Cleanup Questionnaire" (found on our website at http://portal.ncdenr.org/web/wm/sf/ihshome) and any related figures to be included with the report for review. The Branch can subsequently evaluate and make a determination on how to further proceed with any additional assessment or remediation that may be required. Please make certain that the information you provide is complete and accurate. Please note that your failure to inform the Branch of any nearby potable wells or other high risk conditions may adversely affect the Branch's ability to determine if your site presents a higher-risk to human health and the environment.

We also understand that the Site has been contaminated from Underground Storage Tank (UST) petroleum releases under UST Incident Nos. 20181 (active) and 11184 (closed). Please note that any investigation or remediation related to petroleum compounds should be conducted in accordance with the UST Section's regulations and guidance documents. Investigation or remediation reports related to petroleum substances for the UST Section should be submitted to the attention of Brad Newton of the UST Section in the Mooresville Regional Office.

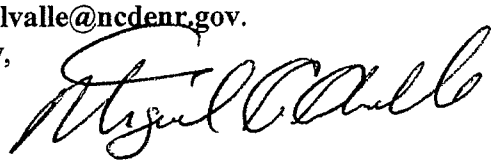
Please note all future submittals of work plans, reports, and data to the Branch should include an electronic copy in a format designated by the Division. Currently, electronic documentation should be submitted on a CD in high resolution (minimum 300 dpi) PDFA format.

Please submit additional reports to:

Miguel A. Alvalle
Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301
Mooresville, North Carolina 28117

If you have questions regarding this information request, please contact me at **(704) 663-1699**, or by email at **miguel.alvalle@ncdenr.gov**.

Sincerely,



Miguel A. Alvalle
Hydrogeologist
Department of Environment and Natural Resources
Division of Waste Management
Superfund Section - Inactive Hazardous Sites Branch

Cc: Brad Newton of the Division of Waste Management UST Section- MRO
Paul Mickler of One Environmental Group- 115 S. Saint Mary's Street, Raleigh, NC 27603

Alvalle, Miguel A

From: Alvalle, Miguel A
Sent: Monday, August 09, 2010 1:11 PM
To: 'Paul Mickler'
Subject: District 12 Response Letter
Attachments: Dist12 Hqtrs Forest Service NONCD0002847 RespLtr 8-09-10.pdf

Paul,
Per our discussion today, attached is an updated electronic copy of the response letter for District 12 Headquarters NC Forest Service NONCD0002847.
You should receive the hardcopy in a few days.
If you have any questions or comments please feel free to contact me.

Thanks

Miguel Alvalle
North Carolina Dept. of Environment & Natural Resources
610 E. Center Ave., Suite 301
Mooresville, NC 28115
Phone: 704-663-1699 Fax: 704-663-6040

Alvalle, Miguel A

From: Alvalle, Miguel A
Sent: Tuesday, August 03, 2010 12:54 PM
To: 'Paul Mickler'
Subject: RE: NCDFR - Mt Holly, IHSB Incident #NONCD0002847 (UST Incident #20181)

Paul,
I will e-mail you an electronic copy of the letter before it goes out in the mail. Otherwise, I will e-mail the sampling requirements by the end of this week.

Best Regards

From: Paul Mickler [mailto:pmickler@oneenv.com]
Sent: Tuesday, August 03, 2010 12:44 PM
To: Alvalle, Miguel A
Subject: RE: NCDFR - Mt Holly, IHSB Incident #NONCD0002847 (UST Incident #20181)

Miguel,

Thank you for getting back to me, in the interest of saving money for the Forestry Service we would like to complete the sampling at the same time, and in order to meet the UST CAP requirements we will need to complete the event and submit the report in August.

Would it be possible for you to e-mail me back what sampling the IHSB will require so that we can schedule the event ASAP.

Thanks,

Paul Mickler
ONE ENVIRONMENTAL GROUP OF CAROLINA, PLLC
980-406-8870

From: Alvalle, Miguel A [mailto:Miguel.Alvalle@ncdenr.gov]
Sent: Tuesday, August 03, 2010 12:25 PM
To: Paul Mickler
Subject: NCDFR - Mt Holly, IHSB Incident #NONCD0002847 (UST Incident #20181)

Mr. Paul Mickler,

The CAP you are referring to is for the UST Section and should be followed to fulfill the regulatory requirements for the UST section's incident number.
IHSB Regulatory oversight for the Site also applies under the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310, et seq., as wells as the 15A NCAC 2L, Groundwater Classifications and Standards. You will need to fulfill the IHSB regulatory requirements including the needed sampling in reference to IHSB incident number assigned to the Site. Eventually you will obtain a separate NFA letter for the IHSB and UST incident number.

After completing my review of the submitted report dated July 9, 2010, I will provide a written response that will include IHSB sampling requirements beyond the already proposed VOCs via 8260.

If you have any questions please contact me at 704-663-1699 x2191 or via e-mail.

Best Regards,

From: Paul Mickler [mailto:pmickler@oneenv.com]
Sent: Monday, August 02, 2010 2:18 PM
To: Alvalle, Miguel A
Subject: Possibly spam: NCDFR - Mt Holly, IHSB Incident #NONCD0002847 (UST Incident #20181)

Miguel,

I spoke with Brad Newton about the report we submitted for the Mt Holly site, based on our discussion for the next sampling event we are planning on sampling only MW-A1, MW-A2 (MW-12) and MW-A3 in addition to the water supply wells as this is what the current CAP for the site includes. We are going to analyze the monitoring well samples by EPA 610 for PAHs and 8260 for VOCs (VOCs were not part of the CAP analysis but we did see TCE in the last sampling event), we are not planning on analyzing the samples for any metals. Please let me know what your thoughts were after you have reviewed the report, the current plan does not match what was in the recommendations but after discussing with Brad we are trying to get back to what the CAP called for.

Feel free to give me a call if you want to discuss further, we will be completing the next sampling event soon.

Thanks,
Paul

Paul Mickler | Project Manager
ONE ENVIRONMENTAL GROUP OF CAROLINA, PLLC
PO BOX 30245, Charlotte, NC 28230
P: 980-406-8870 | F: 757-242-3174
www.oneenv.com

Alvalle, Miguel A

From: Paul Mickler [pmickler@oneenv.com]
Sent: Tuesday, August 03, 2010 12:44 PM
To: Alvalle, Miguel A
Subject: RE: NCDFR - Mt Holly, IHSB Incident #NONCD0002847 (UST Incident #20181)

Miguel,

Thank you for getting back to me, in the interest of saving money for the Forestry Service we would like to complete the sampling at the same time, and in order to meet the UST CAP requirements we will need to complete the event and submit the report in August.

Would it be possible for you to e-mail me back what sampling the IHSB will require so that we can schedule the event ASAP.

Thanks,

Paul Mickler
ONE ENVIRONMENTAL GROUP OF CAROLINA, PLLC
980-406-8870

From: Alvalle, Miguel A [mailto:Miguel.Alvalle@ncdenr.gov]
Sent: Tuesday, August 03, 2010 12:25 PM
To: Paul Mickler
Subject: NCDFR - Mt Holly, IHSB Incident #NONCD0002847 (UST Incident #20181)

Mr. Paul Mickler,

The CAP you are referring to is for the UST Section and should be followed to fulfill the regulatory requirements for the UST section's incident number.
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www.oneenv.com

Alvalle, Miguel A

From: Alvalle, Miguel A
Sent: Tuesday, June 29, 2010 11:17 AM
To: 'Paul Mickler'
Subject: RE: IHSB Incident #NONCD0002847

Mr. Paul Mickler,

The Incident # NONCD0002847 for District 12 headquarter in Mount Holly NC was listed on our inventory on October 24, 2008. Base on our file records two supply well samples at 511 and 517 Flat Rock Cemetery Road detected compounds which include: acetic acid, 1,2,3-trichloro-1-propene, 4-hydroxy-4-methyl-2-pentanone, 5-mehyl-1-hepten-4-ol, and caprolactam. These compounds were also detected in monitoring well MW-12 at the District 12 Headquarters site according to the UST file materials.

Let me know if you have any other questions.

Thanks,

From: Paul Mickler [mailto:pmickler@oneenv.com]
Sent: Monday, June 28, 2010 10:57 AM
To: Alvalle, Miguel A
Subject: IHSB Incident #NONCD0002847

Miguel,

I have a quick question in regards to the IHSB site incident #NONCD0002847, the NCDFR District 12 Headquarters in Mt. Holly. When I completed my file review for the site a couple months ago, I noted that Caprolactum was the contaminant that came up that opened the incident, but cannot find the documentation to support it.

Would it be possible for you to let me know when this Incident number was opened, and what well the detection was made in? Please feel free to give me a call if you have any questions.

Thanks,
Paul

Paul Mickler | Project Manager
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NCDENR

North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue, Governor

Division of Waste Management
UST Section

Dee Freeman, Secretary
Dexter R. Matthews, Director

August 3, 2010

Michael Cox
P.O. Box 383
Mount Holly, North Carolina 28120

Re: Health Risk Evaluation of Water Supply
Tracking ID: UST Incident No. 20181

Dear Mr. Cox:

Please find attached the Sample Analytical Results for a water sample collected from your well, identified as WSW-2, located at 511 Flat Rock Cemetery Road, Mount Holly, Gaston County, on May 27, 2010. The sample was collected and analyzed as part of the investigation of a petroleum release in the vicinity. The water sample was analyzed for specific target analytes (contaminants), which are listed on the attached Sample Analytical Results. Contaminants were detected in the water sample, as shown on the attached Sample Analytical Results.

Because contaminants were detected in the water sample, a Health Risk Evaluation of the water supply was performed by an environmental toxicologist in the Division of Waste Management. The Health Risk Evaluation, which is attached also, compares the detected concentration of contaminants to acceptable concentrations and provides a recommendation for safe use of the water.

If you have any questions, please contact Dave Lilley at (919) 508-8412 or contact me at the address or telephone number listed below for the Mooresville Regional Office.

Sincerely,

Brad C. Newton, P.G.
Hydrogeologist
Mooresville Regional Office

Attachments: Cox Sample Analytical Results
Health Risk Evaluation

cc: Gaston County Health Department
Jan Winters, Gaston County Manager

UST Regional Offices

Asheville (ARO) – 2090 US Highway 70, Swannanoa, NC 28778 (828) 296-4500

Fayetteville (FAY) – 225 Green Street, Suite 714, Systel Building, Fayetteville, NC 28301 (910) 433-3300

Mooresville (MOR) – 610 East Center Avenue, Suite 301, Mooresville, NC 28115 (704) 663-1699

Raleigh (RRO) – 1628 Mail Service Center, Raleigh, NC 27699 (919) 791-4200

Washington (WAS) – 943 Washington Square Mall, Washington, NC 27889 (252) 946-6481

Wilmington (WIL) – 127 Cardinal Drive Extension, Wilmington, NC 28405 (910) 796-7215

Winston-Salem (WS) – 585 Waughtown Street, Winston-Salem, NC 27107 (336) 771-5000

Guilford County Environmental Health, 400 West Market Street, Suite 300, Greensboro, NC 27401, (336) 641-3771

FTP: WS HRE result 0210.dot

NCDENR
North Carolina Department of Environment and Natural Resources
Division of Waste Management
Dexter R. Matthews
Director

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

July 27, 2010

TO: Brad Newton
Mooresville Regional Office
NC UST Section

FROM: David Lilley DBL
Environmental Toxicologist
NC Division of Waste Management

RE: Health Risk Evaluation
Tracking ID: 20181
Cox Well Sampling Results
511 Flat Rock Cemetery Road
Mount Holly, NC

During this sampling event, four contaminants were detected in the well water. One of the contaminants, lead, was detected at a concentration that exceeded applicable standards. The standards used to determine if the water is suitable for drinking and cooking are the United States Environmental Protection Agency's Maximum Contaminant Levels (MCLs) or, if no MCLs exist, North Carolina Groundwater Standards (2L).

If contaminant concentrations exceed the applicable standards for using the water for drinking and cooking, the contaminant concentrations are further analyzed to determine if the water is suitable for other non-ingestive uses, such as showering, bathing, washing dishes, flushing toilets, and hand washing. The chart below compares the detected contaminant concentrations with the applicable standards:

Sample ID	Contaminant	Concentration (ug/l)*	MCL (ug/l)	2L (ug/l)
L461694-10	Copper	890	1,300	
	Lead	28	15	
	Selenium	22	50	
	Zinc	440		1,000

Shaded boxes indicate a standard has been exceeded.

* The abbreviation ug/l stands for micrograms of contaminant per liter of water and is roughly equivalent to parts per billion.

RECOMMENDATION: The lead concentration in this well exceeds the MCL. Therefore, this water is not recommended for drinking or cooking at this time. No restrictions are recommended for using the water for other non-ingestive uses, such as showering, bathing, washing dishes, flushing toilets, and hand washing.

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Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Mr. Eli Holland
ONE Environmental Group
PO Box 6471
Raleigh, NC 27628

June 10,2010

Date Received : May 28, 2010
Description : NCDFR Mount Holly

Sample ID : WSW-2

Collected By : Paul Mickler
Collection Date : 05/27/10 10:15

ESC Sample # : L461694-10

Site ID : MOUNT HOLLY, NC

Project # :

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Antimony	BDL	1.0	ug/l	6020	06/04/10	1
Arsenic	BDL	1.0	ug/l	6020	06/04/10	1
Thallium	BDL	1.0	ug/l	6020	06/04/10	1
Mercury	BDL	0.20	ug/l	7470A	06/01/10	1
Beryllium	BDL	2.0	ug/l	6010B	06/08/10	1
Cadmium	BDL	5.0	ug/l	6010B	06/04/10	1
Chromium	BDL	10.	ug/l	6010B	06/04/10	1
Copper	890	20.	ug/l	6010B	06/04/10	1
Lead	28.	5.0	ug/l	6010B	06/04/10	1
Manganese	BDL	10.	ug/l	6010B	06/04/10	1
Nickel	BDL	20.	ug/l	6010B	06/04/10	1
Selenium	22.	20.	ug/l	6010B	06/04/10	1
Silver	BDL	10.	ug/l	6010B	06/10/10	1
Zinc	440	30.	ug/l	6010B	06/04/10	1
Volatile Organics						
Acetone	BDL	50.	ug/l	8260B	06/08/10	1
Acrolein	BDL	50.	ug/l	8260B	06/08/10	1
Acrylonitrile	BDL	10.	ug/l	8260B	06/08/10	1
Benzene	BDL	1.0	ug/l	8260B	06/08/10	1
Bromobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Bromodichloromethane	BDL	1.0	ug/l	8260B	06/08/10	1
Bromoform	BDL	1.0	ug/l	8260B	06/08/10	1
Bromomethane	BDL	5.0	ug/l	8260B	06/08/10	1
n-Butylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
sec-Butylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
tert-Butylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Carbon tetrachloride	BDL	1.0	ug/l	8260B	06/08/10	1
Chlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Chlorodibromomethane	BDL	1.0	ug/l	8260B	06/08/10	1
Chloroethane	BDL	5.0	ug/l	8260B	06/08/10	1
2-Chloroethyl vinyl ether	BDL	50.	ug/l	8260B	06/08/10	1
Chloroform	BDL	5.0	ug/l	8260B	06/08/10	1
Chloromethane	BDL	2.5	ug/l	8260B	06/08/10	1
2-Chlorotoluene	BDL	1.0	ug/l	8260B	06/08/10	1
4-Chlorotoluene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2-Dibromo-3-Chloropropane	BDL	5.0	ug/l	8260B	06/08/10	1
1,2-Dibromoethane	BDL	1.0	ug/l	8260B	06/08/10	1
Dibromomethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,2-Dichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,3-Dichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,4-Dichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

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REPORT OF ANALYSIS

June 10,2010

Mr. Eli Holland
CNE Environmental Group
PO Box 6471
Raleigh, NC 27628

ESC Sample # : L461694-10

Date Received : May 28, 2010
Description : NCDFR Mount Holly

Site ID : MOUNT HOLLY, NC

Project # :

Sample ID : WSW-2

Collected By : Paul Mickler
Collection Date : 05/27/10 10:15

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Dichlorodifluoromethane	BDL	5.0	ug/l	8260B	06/08/10	1
1,1-Dichloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,2-Dichloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1-Dichloroethene	BDL	1.0	ug/l	8260B	06/08/10	1
cis-1,2-Dichloroethene	BDL	1.0	ug/l	8260B	06/08/10	1
trans-1,2-Dichloroethene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2-Dichloropropane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1-Dichloropropene	BDL	1.0	ug/l	8260B	06/08/10	1
1,3-Dichloropropane	BDL	1.0	ug/l	8260B	06/08/10	1
cis-1,3-Dichloropropene	BDL	1.0	ug/l	8260B	06/08/10	1
trans-1,3-Dichloropropene	BDL	1.0	ug/l	8260B	06/08/10	1
2,2-Dichloropropane	BDL	1.0	ug/l	8260B	06/08/10	1
Di-isopropyl ether	BDL	1.0	ug/l	8260B	06/08/10	1
Ethylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Hexachloro-1,3-butadiene	BDL	1.0	ug/l	8260B	06/08/10	1
Isopropylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
p-Isopropyltoluene	BDL	10.	ug/l	8260B	06/08/10	1
2-Butanone (MEK)	BDL	5.0	ug/l	8260B	06/08/10	1
Methylene Chloride	BDL	10.	ug/l	8260B	06/08/10	1
4-Methyl-2-pentanone (MIBK)	BDL	1.0	ug/l	8260B	06/08/10	1
Methyl tert-butyl ether	BDL	5.0	ug/l	8260B	06/08/10	1
Naphthalene	BDL	1.0	ug/l	8260B	06/08/10	1
n-Propylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Styrene	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,1,2-Tetrachloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,2,2-Tetrachloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,2-Trichloro-1,2,2-trifluoro	BDL	1.0	ug/l	8260B	06/08/10	1
Tetrachloroethene	BDL	5.0	ug/l	8260B	06/08/10	1
Toluene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,3-Trichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,4-Trichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,1-Trichloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,2-Trichloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
Trichloroethene	BDL	5.0	ug/l	8260B	06/08/10	1
Trichlorofluoromethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,3-Trichloropropane	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,4-Trimethylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,3-Trimethylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,3,5-Trimethylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Vinyl chloride	BDL	3.0	ug/l	8260B	06/08/10	1
Xylenes, Total						
Surrogate Recovery						
Toluene-d8	107.		% Rec.	8260B	06/08/10	1
Dibromofluoromethane	112.		% Rec.	8260B	06/08/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

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REPORT OF ANALYSIS

June 10,2010

Mr. Eli Holland
ONE Environmental Group
PO Box 6471
Raleigh, NC 27628

ESC Sample # : L461694-10

Date Received : May 28, 2010
Description : NCDFR Mount Holly

Site ID : MOUNT HOLLY, NC

Sample ID : WSW-2

Project # :

Collected By : Paul Mickler
Collection Date : 05/27/10 10:15

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
1,2,4-Trichlorobenzene	BDL	10.	ug/l	8270C	06/02/10	1
Acid Extractables						
4-Chloro-3-methylphenol	BDL	10.	ug/l	8270C	06/02/10	1
2-Chlorophenol	BDL	10.	ug/l	8270C	06/02/10	1
2,4-Dichlorophenol	BDL	10.	ug/l	8270C	06/02/10	1
2,4-Dimethylphenol	BDL	10.	ug/l	8270C	06/02/10	1
4,6-Dinitro-2-methylphenol	BDL	10.	ug/l	8270C	06/02/10	1
2,4-Dinitrophenol	BDL	10.	ug/l	8270C	06/02/10	1
2-Nitrophenol	BDL	10.	ug/l	8270C	06/02/10	1
4-Nitrophenol	BDL	10.	ug/l	8270C	06/02/10	1
Pentachlorophenol	BDL	10.	ug/l	8270C	06/02/10	1
Phenol	BDL	10.	ug/l	8270C	06/02/10	1
2,4,6-Trichlorophenol	BDL	10.	ug/l	8270C	06/02/10	1
Surrogate Recovery						
2-Fluorophenol	43.8		% Rec.	8270C	06/02/10	1
Phenol-d5	26.3		% Rec.	8270C	06/02/10	1
Nitrobenzene-d5	59.0		% Rec.	8270C	06/02/10	1
2-Fluorobiphenyl	60.3		% Rec.	8270C	06/02/10	1
2,4,6-Tribromophenol	85.4		% Rec.	8270C	06/02/10	1
p-Terphenyl-d14	112.		% Rec.	8270C	06/02/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

Reported: 06/10/10 13:31 Printed: 06/10/10 13:33

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From UST File

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North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue, Governor

Division of Waste Management
UST Section

Dee Freeman, Secretary
Dexter R. Matthews, Director

August 3, 2010

Michael Cox
P.O. Box 383
Mount Holly, North Carolina 28120

Re: Health Risk Evaluation of Water Supply
Tracking ID: UST Incident No. 20181

Dear Mr. Cox:

Please find attached the Sample Analytical Results for a water sample collected from your well, identified as WSW-2, located at 511 Flat Rock Cemetery Road, Mount Holly, Gaston County, on May 27, 2010. The sample was collected and analyzed as part of the investigation of a petroleum release in the vicinity. The water sample was analyzed for specific target analytes (contaminants), which are listed on the attached Sample Analytical Results. Contaminants were detected in the water sample, as shown on the attached Sample Analytical Results.

Because contaminants were detected in the water sample, a Health Risk Evaluation of the water supply was performed by an environmental toxicologist in the Division of Waste Management. The Health Risk Evaluation, which is attached also, compares the detected concentration of contaminants to acceptable concentrations and provides a recommendation for safe use of the water.

If you have any questions, please contact Dave Lilley at (919) 508-8412 or contact me at the address or telephone number listed below for the Mooresville Regional Office.

Sincerely,

Brad C. Newton, P.G.
Hydrogeologist
Mooresville Regional Office

Attachments: Cox Sample Analytical Results
Health Risk Evaluation

cc: Gaston County Health Department
Jan Winters, Gaston County Manager

UST Regional Offices

Asheville (ARO) – 2090 US Highway 70, Swannanoa, NC 28778 (828) 296-4500

Fayetteville (FAY) – 225 Green Street, Suite 714, Systel Building, Fayetteville, NC 28301 (910) 433-3300

Mooresville (MOR) – 610 East Center Avenue, Suite 301, Mooresville, NC 28115 (704) 663-1699

Raleigh (RRO) – 1628 Mail Service Center, Raleigh, NC 27699 (919) 791-4200

Washington (WAS) – 943 Washington Square Mall, Washington, NC 27889 (252) 946-6481

Wilmington (WIL) – 127 Cardinal Drive Extension, Wilmington, NC 28405 (910) 796-7215

Winston-Salem (WS) – 585 Waughtown Street, Winston-Salem, NC 27107 (336) 771-5000

Guilford County Environmental Health, 400 West Market Street, Suite 300, Greensboro, NC 27401, (336) 641-3771

FTP: WS HRE result 0210.dot

NCDENR
North Carolina Department of Environment and Natural Resources
Division of Waste Management
Dexter R. Matthews
Director

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

July 27, 2010

TO: Brad Newton
Mooresville Regional Office
NC UST Section

FROM: David Lilley DBL
Environmental Toxicologist
NC Division of Waste Management

RE: Health Risk Evaluation
Tracking ID: 20181
Cox Well Sampling Results
511 Flat Rock Cemetery Road
Mount Holly, NC

During this sampling event, four contaminants were detected in the well water. One of the contaminants, lead, was detected at a concentration that exceeded applicable standards. The standards used to determine if the water is suitable for drinking and cooking are the United States Environmental Protection Agency's Maximum Contaminant Levels (MCLs) or, if no MCLs exist, North Carolina Groundwater Standards (2L).

If contaminant concentrations exceed the applicable standards for using the water for drinking and cooking, the contaminant concentrations are further analyzed to determine if the water is suitable for other non-ingestive uses, such as showering, bathing, washing dishes, flushing toilets, and hand washing. The chart below compares the detected contaminant concentrations with the applicable standards:

Sample ID	Contaminant	Concentration (ug/l)*	MCL (ug/l)	2L (ug/l)
L461694-10	Copper	890	1,300	
	Lead	28	15	
	Selenium	22	50	
	Zinc	440		1,000

Shaded boxes indicate a standard has been exceeded.

* The abbreviation ug/l stands for micrograms of contaminant per liter of water and is roughly equivalent to parts per billion.

RECOMMENDATION: The lead concentration in this well exceeds the MCL. Therefore, this water is not recommended for drinking or cooking at this time. No restrictions are recommended for using the water for other non-ingestive uses, such as showering, bathing, washing dishes, flushing toilets, and hand washing.

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Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Mr. Eli Holland
ONE Environmental Group
PO Box 6471
Raleigh, NC 27628

June 10,2010

Date Received : May 28, 2010
Description : NCDFR Mount Holly

Sample ID : WSW-2

Collected By : Paul Mickler
Collection Date : 05/27/10 10:15

ESC Sample # : L461694-10

Site ID : MOUNT HOLLY, NC

Project # :

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Antimony	BDL	1.0	ug/l	6020	06/04/10	1
Arsenic	BDL	1.0	ug/l	6020	06/04/10	1
Thallium	BDL	1.0	ug/l	6020	06/04/10	1
Mercury	BDL	0.20	ug/l	7470A	06/01/10	1
Beryllium	BDL	2.0	ug/l	6010B	06/08/10	1
Cadmium	BDL	5.0	ug/l	6010B	06/04/10	1
Chromium	BDL	10.	ug/l	6010B	06/04/10	1
Copper	890	20.	ug/l	6010B	06/04/10	1
Lead	28.	5.0	ug/l	6010B	06/04/10	1
Manganese	BDL	10.	ug/l	6010B	06/04/10	1
Nickel	BDL	20.	ug/l	6010B	06/04/10	1
Selenium	22.	20.	ug/l	6010B	06/04/10	1
Silver	BDL	10.	ug/l	6010B	06/10/10	1
Zinc	440	30.	ug/l	6010B	06/04/10	1
Volatile Organics						
Acetone	BDL	50.	ug/l	8260B	06/08/10	1
Acrolein	BDL	50.	ug/l	8260B	06/08/10	1
Acrylonitrile	BDL	10.	ug/l	8260B	06/08/10	1
Benzene	BDL	1.0	ug/l	8260B	06/08/10	1
Bromobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Bromodichloromethane	BDL	1.0	ug/l	8260B	06/08/10	1
Bromoform	BDL	1.0	ug/l	8260B	06/08/10	1
Bromomethane	BDL	5.0	ug/l	8260B	06/08/10	1
n-Butylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
sec-Butylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
tert-Butylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Carbon tetrachloride	BDL	1.0	ug/l	8260B	06/08/10	1
Chlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Chlorodibromomethane	BDL	1.0	ug/l	8260B	06/08/10	1
Chloroethane	BDL	5.0	ug/l	8260B	06/08/10	1
2-Chloroethyl vinyl ether	BDL	50.	ug/l	8260B	06/08/10	1
Chloroform	BDL	5.0	ug/l	8260B	06/08/10	1
Chloromethane	BDL	2.5	ug/l	8260B	06/08/10	1
2-Chlorotoluene	BDL	1.0	ug/l	8260B	06/08/10	1
4-Chlorotoluene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2-Dibromo-3-Chloropropane	BDL	5.0	ug/l	8260B	06/08/10	1
1,2-Dibromoethane	BDL	1.0	ug/l	8260B	06/08/10	1
Dibromomethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,2-Dichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,3-Dichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,4-Dichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

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Tax I.D. 62-0814289

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REPORT OF ANALYSIS

June 10,2010

Mr. Eli Holland
ONE Environmental Group
PO Box 6471
Raleigh, NC 27628

ESC Sample # : L461694-10

Date Received : May 28, 2010
Description : NCDFR Mount Holly

Site ID : MOUNT HOLLY, NC

Sample ID : WSW-2

Project # :

Collected By : Paul Mickler
Collection Date : 05/27/10 10:15

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Dichlorodifluoromethane	BDL	5.0	ug/l	8260B	06/08/10	1
1,1-Dichloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,2-Dichloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1-Dichloroethene	BDL	1.0	ug/l	8260B	06/08/10	1
cis-1,2-Dichloroethene	BDL	1.0	ug/l	8260B	06/08/10	1
trans-1,2-Dichloroethene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2-Dichloropropane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1-Dichloropropene	BDL	1.0	ug/l	8260B	06/08/10	1
1,3-Dichloropropane	BDL	1.0	ug/l	8260B	06/08/10	1
cis-1,3-Dichloropropene	BDL	1.0	ug/l	8260B	06/08/10	1
trans-1,3-Dichloropropene	BDL	1.0	ug/l	8260B	06/08/10	1
2,2-Dichloropropane	BDL	1.0	ug/l	8260B	06/08/10	1
Di-isopropyl ether	BDL	1.0	ug/l	8260B	06/08/10	1
Ethylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Hexachloro-1,3-butadiene	BDL	1.0	ug/l	8260B	06/08/10	1
Isopropylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
p-Isopropyltoluene	BDL	10.	ug/l	8260B	06/08/10	1
2-Butanone (MEK)	BDL	5.0	ug/l	8260B	06/08/10	1
Methylene Chloride	BDL	10.	ug/l	8260B	06/08/10	1
4-Methyl-2-pentanone (MIBK)	BDL	1.0	ug/l	8260B	06/08/10	1
Methyl tert-butyl ether	BDL	5.0	ug/l	8260B	06/08/10	1
Naphthalene	BDL	1.0	ug/l	8260B	06/08/10	1
n-Propylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Styrene	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,1,2-Tetrachloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,2,2-Tetrachloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,2-Trichloro-1,2,2-trifluoro	BDL	1.0	ug/l	8260B	06/08/10	1
Tetrachloroethene	BDL	5.0	ug/l	8260B	06/08/10	1
Toluene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,3-Trichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,4-Trichlorobenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,1-Trichloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,1,2-Trichloroethane	BDL	1.0	ug/l	8260B	06/08/10	1
Trichloroethene	BDL	5.0	ug/l	8260B	06/08/10	1
Trichlorofluoromethane	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,3-Trichloropropane	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,4-Trimethylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,2,3-Trimethylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
1,3,5-Trimethylbenzene	BDL	1.0	ug/l	8260B	06/08/10	1
Vinyl chloride	BDL	3.0	ug/l	8260B	06/08/10	1
Xylenes, Total						
Surrogate Recovery						
Toluene-d8	107.		% Rec.	8260B	06/08/10	1
Dibromofluoromethane	112.		% Rec.	8260B	06/08/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

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REPORT OF ANALYSIS

Mr. Eli Holland
ONE Environmental Group
PO Box 6471
Raleigh, NC 27628

June 10,2010

ESC Sample # : L461694-10

Site ID : MOUNT HOLLY, NC

Project # :

Date Received : May 28, 2010
Description : NCDFR Mount Holly

Sample ID : WSW-2

Collected By : Paul Mickler
Collection Date : 05/27/10 10:15

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
1,2,4-Trichlorobenzene	BDL	10.	ug/l	8270C	06/02/10	1
Acid Extractables						
4-Chloro-3-methylphenol	BDL	10.	ug/l	8270C	06/02/10	1
2-Chlorophenol	BDL	10.	ug/l	8270C	06/02/10	1
2,4-Dichlorophenol	BDL	10.	ug/l	8270C	06/02/10	1
2,4-Dimethylphenol	BDL	10.	ug/l	8270C	06/02/10	1
4,6-Dinitro-2-methylphenol	BDL	10.	ug/l	8270C	06/02/10	1
2,4-Dinitrophenol	BDL	10.	ug/l	8270C	06/02/10	1
2-Nitrophenol	BDL	10.	ug/l	8270C	06/02/10	1
4-Nitrophenol	BDL	10.	ug/l	8270C	06/02/10	1
Pentachlorophenol	BDL	10.	ug/l	8270C	06/02/10	1
Phenol	BDL	10.	ug/l	8270C	06/02/10	1
2,4,6-Trichlorophenol	BDL	10.	ug/l	8270C	06/02/10	1
Surrogate Recovery						
2-Fluorophenol	43.8		% Rec.	8270C	06/02/10	1
Phenol-d5	26.3		% Rec.	8270C	06/02/10	1
Nitrobenzene-d5	59.0		% Rec.	8270C	06/02/10	1
2-Fluorobiphenyl	60.3		% Rec.	8270C	06/02/10	1
2,4,6-Tribromophenol	85.4		% Rec.	8270C	06/02/10	1
p-Terphenyl-d14	112.		% Rec.	8270C	06/02/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

Reported: 06/10/10 13:31 Printed: 06/10/10 13:33

ONE Environmental Group

8 July 2010

Via UPS Ground (Tracking #1Z2W43110391398412)
Mr. Brad Newton
North Carolina Department of Environment and Natural Resources
Division of Waste Management – UST Section
Mooresville Regional Office
610 East Center Avenue
Mooresville, NC 28115

RE: ***2010 Semi-Annual Groundwater Monitoring Report***
North Carolina Division of Forest Resources – District 12 Warehouse
Incident #: 20181

Dear Mr. Newton,

On behalf of the North Carolina Division of Forest Resources (NCDFR), ONE Environmental Group of Carolina, PLLC (ONE) herein provides one (1) copy of the *2010 Semi-Annual Groundwater Monitoring Report* for the NCDFR District 12 Facility located in Mount Holly, North Carolina (Incident #20181). This report documents the groundwater sampling activities completed in May 2010 and provides conclusions and recommendations for the subject site.

ONE appreciates the opportunity to work with the North Carolina Department of Environment and Natural Resources (NCDENR) on this important project. Should you have any questions, please do not hesitate to contact me at (919) 699-7347.

Respectfully submitted,
ONE Environmental Group of Carolina, PLLC

Eli Holland, P.G.
Principal

cc: Robert Gron, NCDFR
Miguel Alvalle, NCDENR Inactive Hazardous Sites

COPY

NCDENR

North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

January 4, 2010

Mr. Michael & Mary Cox
P.O Box 383
Mount Holly, North Carolina 28120

Re: **Supply Well Sampling Results (WSW-2)**
Michael & Mary Cox
511 Flat Rock Cemetery Road,
Mount Holly, Gaston County, North Carolina
Parcel ID#177751
IHSB No: NONCD0002847

Dear Property Owner (s):

On September 9, 2010, One Environmental Group of Carolina, PLLC. collected samples from the water supply well and the "house tap" located at 511 Flat Rock Cemetery Road in Mount Holly, Gaston County, North Carolina (Parcel ID#177751). The samples were submitted for laboratory analyses to ESC Lab Sciences in Mount Juliet, Tennessee. The analysis included select Metals and/or Volatile Organic Compounds (VOCs), which are related to a variety of chemicals associated with solvents and petroleum products.

The laboratory results in the ESC Lab Sciences Report Section L478142-04 indicated that at the time of sampling copper, and zinc were detected in your water supply. No other Metals and or VOCs compounds were detected in the water sample above their respective practical quantitation limit (PQL). The PQL is the concentration that must be present in the sample for the laboratory to reliably measure it. The PQLs for this sample were below applicable federal drinking water standards (USEPA MCL) and the North Carolina Groundwater Quality Standards (15A NCAC 2L) which are regulatory limits for chemicals in groundwater. Although, the low level concentration of copper, and zinc compounds detected in the sample did not exceed applicable regulatory limits, a Health Risk Evaluation (HRE) was requested from the Inactive Hazardous Sites Branch's toxicologist Hanna Assefa. Copies of the laboratory report and HRE for your well water samples are enclosed.

A summary table of the selected compounds, along with its corresponding regulatory limits, is included below:

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115
Phone: 704-663-1699 \ FAX: 704-663-6040 \ Internet: www.wastenotnc.org

Location	Chemical	Units	Cox (09-09-10)	US.EPA MCL	15ANCAC 2L
WSW-2 (Well head)	Copper	µg/L	60	1,300	**
	Lead	µg/L	<5 (BDL)	15	**
	Zinc	µg/L	60	*	1000
WSW-2-House (Tap)	Copper	µg/L	84	***	***
	Lead	µg/L	<25 (BDL)	***	***
	Zinc	µg/L	71	***	***

- EPA MCL = Environmental Protection Agency Maximum Contaminant Level
- BDL- below detection limit
- µg/L = micrograms per Liter (~parts per billion)
- * Not Available
- ** Not Applicable
- *** Not Evaluated

Based on the evaluation of the toxicologist, the water from this well is safe for potable purposes and can be use for drinking, cooking and all other residential purposes listed in the attached HRE. Sampling results demonstrated that metals concentrations reported in the household tap sample (WSW-2 House) may be related to household plumbing issues as concentrations are greater than on the well head. It also, indicates that metals detected may be related to naturally occurring conditions in groundwater. For information on Metals and Lead in drinking water please refer to Gaston County Health Department web page at http://www.co.gaston.nc.us/HealthDept/index.HTM or the Center for Disease Control at http://www.cdc.gov/nceh/lead/ .

If you have any questions about this HRE, please contact me at (704) 663-1699. You also may email or write to me at address below. Thank you for your assistance and cooperation with this project.

Sincerely,

Miguel A. Alvalle
Hydrogeologist
Department of Environment and Natural Resources
Division of Waste Management
Superfund Section - Inactive Hazardous Sites Branch
Miguel.Alvalle@ncdenr.gov

Enclosures: Attachment- ESC Lab Sciences Report Section L478142-04
IHSB - Health Risk Evaluation

cc: Brad Newton of the Division of Waste Management UST Section- MRO
Gaston County Health Dept.

NCDENR
North Carolina Department of Environment and Natural Resources
Division of Waste Management
Dexter R. Matthews
Director

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

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January 4, 2010

David L. Gibson
P.O Box 764
Mount Holly, North Carolina 28120

Re: **Supply Well Sampling Results (WSW-5)**
David L. Gibson
516 Flat Rock Cemetery Road,
Mount Holly, Gaston County, North Carolina
Parcel ID#177753
IHSB No: NONCD0002847

Dear Property Owner (s):

On September 9, 2010, One Environmental Group of Carolina, PLLC. collected sample from the water supply well located at 517 Flat Rock Cemetery Road in Mount Holly, Gaston County, North Carolina. The sample was submitted for laboratory analyses to ESC Lab Sciences in Mount Juliet, Tennessee. The analysis included select Metals and/or Volatile Organic Compounds (VOCs), which are related to a variety of chemicals associated with solvents and petroleum products.

The laboratory results in the ESC Lab Sciences Report Section L478142-05 indicated that at the time of sampling zinc was detected in your water supply. No other Metals and or VOCs compounds were detected in the water sample above their respective practical quantitation limit (PQL). The PQL is the concentration that must be present in the sample for the laboratory to reliably measure it. The PQLs for this sample were below applicable federal drinking water standards (USEPA MCL) and the North Carolina Groundwater Quality Standards (15A NCAC 2L) which are regulatory limits for chemicals in groundwater. Although, the low level concentration of zinc detected in the sample did not exceed applicable regulatory limits, a Health Risk Evaluation (HRE) was requested from the Inactive Hazardous Sites Branch toxicologist Hanna Assefa. Copies of the laboratory report and HRE for your well water sample is enclosed.

A summary table of the selected compounds, along with its corresponding regulatory limits, is included below:

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115
Phone: 704-663-1699 \ FAX: 704-663-6040 \ Internet: www.wastenotnc.org

Location	Chemical	Units	Cox (09-09-10)	US.EPA MCL	15ANCAC 2L
WSW-4 (Well head)	Copper	µg/L	<20 (BDL)	1,300	**
	Lead	µg/L	<5 (BDL)	15	**
	Zinc	µg/L	50	*	1000

- EPA MCL = Environmental Protection Agency Maximum Contaminant Level
- BDL- below detection limit
- µg/L = micrograms per Liter (~parts per billion)
- * Not Available
- ** Not Applicable

Based on the evaluation of the toxicologist, the water from this well is safe for potable purposes and can be use for drinking, cooking and all other residential purposes listed in the attached HRE. Sampling results demonstrated that lead and other metals concentrations reported in the house tap sample (WSW-4 House) may be related to household plumbing issues as concentrations are greater than on the well head. It also, indicates that metals detected may be related to naturally occurring conditions in groundwater. For information on Metals and Lead in drinking water please refer to Gaston County Health Department web page at http://www.co.gaston.nc.us/HealthDept/index.HTM or the Center for Disease Control at http://www.cdc.gov/nceh .

If you have any questions about this HRE, please contact me at (704) 663-1699. You also may email or write to me at address below. Thank you for your assistance and cooperation with this project.

Sincerely,

Miguel A. Alvalle
Hydrogeologist
Department of Environment and Natural Resources
Division of Waste Management
Superfund Section - Inactive Hazardous Sites Branch
Miguel.Alvalle@ncdenr.gov

Enclosures: Attachment- ESC Lab Sciences Report Section L478142-04
IHSB - Health Risk Evaluation

cc: Gaston County Health Dept.
Brad Newton of the Division of Waste Management UST Section- MRO

NCDENR
North Carolina Department of Environment and Natural Resources
Division of Waste Management
Beverly Eaves Perdue
Governor
Dexter R. Matthews
Director
Dee Freeman
Secretary

COPY

January 4, 2010

Mr. Allen Williams
NCDENR, Division of Forest Resources
P.O. Box 29581
Raleigh, NC 27626-0581

Re: **Review of Semi-Annual Natural Attenuation Groundwater Sampling Report, Site Cleanup Questionnaire & NFA Request**
District 12 Headquarters
NC Highway 273, Gaston County, NC
IHSB Incident No.NONCD0002847 & UST Incident Nos. 20181(Active) & 11184(Close)

Dear Mr. Williams:

The Division of Waste Management (DWM) – Superfund Section's - Inactive Hazardous Sites Branch (Branch) has reviewed the September 29, 2010, "Semi-Annual 2010 Natural Attenuation Groundwater Sampling Report" (Semi-Annual 2010) and "Site Cleanup Questionnaire" submitted by One Environmental Group for the subject Site, located at NC Highway 273, Gaston County, North Carolina (Site). In addition to the petroleum compounds being regulated at your Site by the DWM's Underground Storage Section, the Branch has regulatory jurisdiction over non-petroleum hazardous substances detected in supply wells adjacent to your Site. Based on this report and our file records, the Branch has made a determination on how to further proceed with this Site.

The historical monitoring reports and relevant documentation indicated that your Site may have been contaminated by one or more hazardous substances. Based on the review of the submitted reports, the following compounds were detected in supply wells located at 511 (WSW-1 and WSW-2), 517 (WSW-4), and 516 (WSW-5) Flat Rock Cemetery Road. The compounds include: acetic acid, 1,2,3 -trichloro-1-propene, 4-hydroxy-4-methyl-2-pentanone, 5-mehyl-1-hepten-4-ol, caprolactam, Bis(2-ethylhexyl)phthalate, and lead. Various compounds were also detected in onsite monitoring wells MW-A1, MW-3, MW-4, MW-7, MW-8, MW-10, and MW-12. Detections of Cadmium at MW-7, Chromium at MW-A3, Lead at WSW-2, and Bis(2-ethylhexyl)phthalate WSW-4 were above the state's 15A NCAC 2L groundwater quality limits and the Federal Drinking Water Standards (USEPA MCL). These are groundwater classifications and standards which are regulatory limits for chemicals in groundwater. Detections of Manganese at MW-A1, MW-4, MW-7, and MW-10, and Selenium at WSW-2 were also above the 15A NCAC 2L and/or secondary USEPA MCL standards.

Given the nature of the compounds detected at the Site and surrounding water supply wells, the Branch requested that confirmation samples be collected from area water supply wells from both the wellhead and at a household tap at WSW-1, WSW-2, WSW-4 and WSW-5, and from the onsite monitoring wells from MW-A1, MW-7 and a up-gradient monitoring well. Based on the review of additional data, the Branch has determined that the elevated concentrations of chromium, copper, manganese, nickel and lead in groundwater are caused by naturally occurring conditions at this Site. Moreover, the confirmation samples collected from the area water supply wells from the wellhead and at the household tap from WSW-1, WSW-2, and WSW-4 demonstrated that lead concentrations are related to household plumbing issues as lead concentrations are greater at the household tap.

The Branch has determined that the metal detections in groundwater were caused by naturally occurring conditions at this Site. The groundwater analytical samples collected at the Site did not reveal continued detections or exceedances of the state's 15A NCAC 2L groundwater quality standards for the above compounds of concern. **This Site has been transferred to the "No Further Action" category in the Inactive Hazardous Sites Branch's inventory of sites. No further remedial action will be required unless the Department later determines, based on new information or information not previously provided to the Department, that the site has not been remediated to current standards or that the Department was provided with false or incomplete information.**

Please note that additional investigation or remediation related to petroleum compounds may still need to be conducted in accordance with the Division of Waste Management - Underground Storage Tank (UST) Section's regulations and guidance documents. Any future investigation or remediation reports related to petroleum substances will be the responsibility of the Division of Waste Management's UST Section and should be forwarded to the attention of Brad Newton of the UST Section in the Mooresville Regional Office.

If you have additional questions, please contact me at (704) 663-1699 or by email at miguel.alvalle@ncdenr.gov .

Sincerely,

Miguel A. Alvalle,
Hydrogeologist
Department of Environment and Natural Resources
Division of Waste Management
Superfund Section - Inactive Hazardous Sites Branch

Cc: Brad Newton of the Division of Waste Management UST Section- MRO
David L. Gibson, Owner of WSW- 3 & 5 - P.O. Box 764, Mount Holly, NC 28120
Michael Cox, Owner of WSW-1, 2 & 4- P.O. Box 383, Mount Holly, NC 28120
Paul Mickler of One Environmental Group - 115 S. Saint Mary's Street, Raleigh, NC 27603

COPY

NCDENR

North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

January 4, 2010

Mr. Michael & Mary Cox
P.O Box 383
Mount Holly, North Carolina 28120

Re: **Supply Well Sampling Results (WSW-4)**
Michael & Mary Cox
517 Flat Rock Cemetery Road,
Mount Holly, Gaston County, North Carolina
Parcel ID#177752.
IHSB No: NONCD0002847

Dear Property Owner (s):

On September 9, 2010, One Environmental Group of Carolina, PLLC. collected samples from the water supply well and the "house tap" located at 517 Flat Rock Cemetery Road in Mount Holly, Gaston County, North Carolina. The samples were submitted for laboratory analyses to ESC Lab Sciences in Mount Juliet, Tennessee. The analysis included select Metals and/or Volatile Organic Compounds (VOCs), which are related to a variety of chemicals associated with solvents and petroleum products.

The laboratory results in the ESC Lab Sciences Report Section L478142-03 indicated that at the time of sampling copper, lead, and zinc were detected in your water supply. No other Metals and or VOCs compounds were detected in the water sample above their respective practical quantitation limit (PQL). The PQL is the concentration that must be present in the sample for the laboratory to reliably measure it. The PQLs for this sample were below applicable federal drinking water standards (USEPA MCL) and the North Carolina Groundwater Quality Standards (15A NCAC 2L) which are regulatory limits for chemicals in groundwater. Although, the low level concentration of copper, lead, and zinc were compounds detected in the sample did not exceed applicable regulatory limits, a Health Risk Evaluation (HRE) was requested from the Inactive Hazardous Sites Branch toxicologist Hanna Assefa. Copies of the laboratory report and HRE for your well water samples are enclosed.

A summary table of the selected compounds, along with its corresponding regulatory limits, is included below:

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115
Phone: 704-663-1699 \ FAX: 704-663-6040 \ Internet: www.wastenotnc.org

Location	Chemical	Units	Cox (09-09-10)	US.EPA MCL	15ANCAC 2L
WSW-4 (Well head)	Copper	µg/L	24	1,300	**
	Lead	µg/L	<5 (BDL)	15	**
	Zinc	µg/L	33	*	1000
WSW-4-House (Tap)	Copper	µg/L	46	1300	**
	Lead	µg/L	5.2	15	**
	Zinc	µg/L	40	**	1000

- EPA MCL = Environmental Protection Agency Maximum Contaminant Level
- BDL- below detection limit
- µg/L = micrograms per Liter (~parts per billion)
- * Not Available
- ** Not Applicable

Based on the evaluation of the toxicologist, the water from this well is safe for potable purposes and can be use for drinking, cooking and all other residential purposes listed in the attached HRE. Sampling results demonstrated that lead and other metals concentrations reported in the house tap sample (WSW-4 House) may be related to household plumbing issues as concentrations are greater than on the well head. It also, indicates that metals detected may be related to naturally occurring conditions in groundwater. For information on Metals and Lead in drinking water please refer to Gaston County Health Department web page at http://www.co.gaston.nc.us/HealthDept/index.HTM or the Center for Disease Control at http://www.cdc.gov/nceh .

If you have any questions about this HRE, please contact me at (704) 663-1699. You also may email or write to me at address below. Thank you for your assistance and cooperation with this project.

Sincerely,

Miguel A. Alvalle
Hydrogeologist
Department of Environment and Natural Resources
Division of Waste Management
Superfund Section - Inactive Hazardous Sites Branch
Miguel.Alvalle@ncdenr.gov

Enclosures: Attachment- ESC Lab Sciences Report L478142-04
IHSB - Health Risk Evaluation

cc: Gaston County Health Dept
Brad Newton of the Division of Waste Management UST Section- MRO.

January 03, 2010

MEMORANDUM

TO: Hanna Assefa, Industrial Hygienist
Superfund Section, Inactive Hazardous Sites Branch (IHSB)

FROM: Miguel Alvalle, Hydrogeologist
Superfund Section, IHSB

RE: Health Risk Evaluation Request (WSW-5)
David L. Gibson
516 Flat Rock Cemetery Road, Mount Holly
Gaston County, NC
Parcel ID#177753

One Environmental Group collected a sample from a potable well at the above reference location on September 09, 2010. IHSB requests a health risk evaluation and a recommendation for the continued use of this well. The following table summarizes the detected chemicals and the corresponding concentrations. The laboratory analytical reports associated with these samples are attached.

Location	Chemical	Units	Gibson (09-10-10)
WSW-5 (Well head)	Zinc	µg/L	50

BDL- below detection limit

Attachment- ESC Lab Sciences Report L478144-05

District 12 Headquarters
NONCD0002847
Mount Holly, Gaston County

review of 2009 1st semi-annual sampling report

Table 3 compares potable well sample results to EPA secondary standards. These standards are not heath based and should not be used to determine of suitability of potable water for consumption. If there is no primary EPA standard, the NC 2L standard is to be used. Therefore, zinc in potable well WSW-2 did not exceed the 2L standard (see Table 3). Where there is no EPA primary standard and no 2L standard, Hanna Assefa provides a calculated health based allowable concentration. Therefore, manganese does not exceed the calculated health based concentration (see Table 3).

Chromium and manganese exceeded 2L standards in several groundwater monitor wells.

Contaminants listed in the lab report but not listed on the analytical summary tables:
MW-A1
cis-1,2-dichloroethene at 0.74 J ppb.
tetrachloroethene at 102 ppb.

MW-A3
antimony at 2.7 J ppb.
methylene chloride at 102 J ppb.

MW-7
thallium at 3.2 J ppb.
bis(2-ethylhexyl)phthalate at 3.3 J ppb.
chlorobenzene at 0.23 J ppb.
cis-1,2-dichloroethene at 0.67 J ppb.
tetrachloroethene at 0.52 J ppb.

MW-10
arsenic at 3.2 J ppb.
silver at 0.13 J ppb.
thallium at 4.0 J ppb.
benzene at 0.37 J ppb:
chlorobenzene at 6.3 ppb.
cis-1,2-dichloroethene at 0.54 J ppb.
tetrachloroethene at 0.53 J ppb.

MW-11
nickel is miss-listed at 10.2 J ppb, it should be 2.7 J ppb.

WSW-2
chloroform at 0.79 J ppb.

WSW-4
chloroform at 0.44 J ppb.

WSW-5
chloroform at 0.85 J ppb.

N. C. Dept. Of Environment & Natural Resources
Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, NC 27605
(919) 508-8400
Fax: (919) 715-5840

Fax transmittal

To: Allen Williams – Division of Forest Resources

Fax: 857-4803

From: Bruce E. Lefler Jr.

Date: May 8, 2008

Re: District 12 Headquarters

Page(s): including cover sheet 8

Remarks: Here are 4 memos regarding water supply well sampling results and the Site Cleanup Questionnaire (3 pages). Please give me a call if I can be of further assistance.

North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor
William G. Ross Jr., Secretary

Division of Waste Management
Underground Storage Tank Section

Dexter R. Matthews, Director

April 14, 2005

David Gibson
P.O. Box 764
Mount Holly, North Carolina 28120

RE: Sample Results
Gibson Water Supply Well (WSW-5)
Mount Holly, Gaston County

Dear Mr. Gibson:

On February 28, 2005, Froehling and Robertson, Inc. personnel, representatives of North Carolina Forest Service, sampled your water supply well. The sample was analyzed for volatile and semi-volatile organic compounds. Volatile and semi-volatile organic compounds include a wide range of manmade compounds including, but not limited to, gasoline components and chlorinated solvents used as degreasers. The February 28, 2005 sample detected 1,2,3-trichloro-1-propene, 4-hydroxy-4methyl-2-pentanone, and acetic acid in the well water.

Laboratory results from these samples are summarized below. These results represent the conditions in your well at the time of sampling:

Compound	Concentration*	NC Maximum Allowable Concentration
1,2,3-trichloro-1-propene	8.0 ug/L	Laboratory Method Detection Limit
4-hydroxy-4methyl-2-pentanone	19 ug/L	Laboratory Method Detection Limit
acetic acid	18 ug/L	Laboratory Method Detection Limit

*ug/L – parts per billion

I have forwarded a copy of the laboratory analytical report to Dr. Ken Rudo, of the Occupational and Environmental Epidemiology Branch of the Division of Public Health, and requested a Health Risk Evaluation. If you have any questions, please contact me at the address or telephone number provided. Dr. Rudo can be reached at (919) 715-6430.

Sincerely,

Brad C. Newton, P.G.
Hydrogeologist II
Mooresville Regional Office

Attachments

cc: James Thompson – Gaston County Health Department
Bruce Parris - Aquifer Protection Section, MRO

NCDENR
North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor
William G. Ross Jr., Secretary

Division of Waste Management
Underground Storage Tank Section

Dexter R. Matthews, Director

April 14, 2005

Michael and Mary Cox
P.O. Box 383
Mount Holly, North Carolina 28120

RE: Sample Results
Cox Water Supply Well (WSW-4)
517 Flat Rock Cemetery Road
Mount Holly, Gaston County

Dear Mr. and Mrs. Cox:

On February 28, 2005, Froehling and Robertson, Inc. personnel, representatives of North Carolina Forest Service, sampled your water supply well. The sample was analyzed for volatile and semi-volatile organic compounds. Volatile and semi-volatile organic compounds include a wide range of manmade compounds including, but not limited to, gasoline components and chlorinated solvents used as degreasers. The February 28, 2005 sample detected 1,2,3-trichloro-1-propane, 4-hydroxy-4methyl-2-pentanone, 5-methyl-1-hepten-4-ol, and acetic acid in the well water.

Laboratory results from these samples are summarized below. These results represent the conditions in your well at the time of sampling:

Compound	Concentration*	NC Maximum Allowable Concentration
1,2,3-trichloro-1-propene	6.0 ug/L	Laboratory Method Detection Limit
4-hydroxy-4-methyl-2-pentanone	15 ug/L	Laboratory Method Detection Limit
5-methyl-1-hepten-4-ol	12 ug/L	Laboratory Method Detection Limit
acetic acid	108 ug/L	Laboratory Method Detection Limit

*ug/L – parts per billion

I have forwarded a copy of the laboratory analytical report to Dr. Ken Rudo, of the Occupational and Environmental Epidemiology Branch of the Division of Public Health, and requested a Health Risk Evaluation. If you have any questions, please contact me at the address or telephone number provided. Dr. Rudo can be reached at (919) 715-6430.

Sincerely,

Brad C. Newton, P.G.
Hydrogeologist II
Mooresville Regional Office

Attachments
cc: James Thompson – Gaston County Health Department
Bruce Parris - Aquifer Protection Section, MRO

NCDENR
North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor
William G. Ross Jr., Secretary

Division of Waste Management
Underground Storage Tank Section

Dexter R. Matthews, Director

June 10, 2005

Michael and Mary Cox
P.O. Box 383
Mount Holly, North Carolina 28120

RE: Sample Results
Cox Water Supply Well (WSW-4)
517 Flat Rock Cemetery Road
Mount Holly, Gaston County

Dear Mr. and Mrs. Cox:

On February 28, 2005, Froehling and Robertson, Inc. personnel, representatives of North Carolina Forest Service, sampled your water supply well. The sample was analyzed for volatile and semi-volatile organic compounds. Volatile and semi-volatile organic compounds include a wide range of manmade compounds including, but not limited to, gasoline components and chlorinated solvents used as degreasers. The February 28, 2005 sample detected 1,2,3-trichloro-1-propane, 4-hydroxy-4methyl-2-pentanone, 5-methyl-1-hepten-4-ol, and acetic acid in the well water.

Laboratory results from these samples are summarized below. These results represent the conditions in your well at the time of sampling:

Compound	Concentration*	NC Maximum Allowable Concentration
1,2,3-trichloro-1-propene	6.0 ug/L	Laboratory Method Detection Limit
4-hydroxy-4-methyl-2-pentanone	15 ug/L	Laboratory Method Detection Limit
5-methyl-1-hepten-4-ol	12 ug/L	Laboratory Method Detection Limit
acetic acid	108 ug/L	Laboratory Method Detection Limit

*ug/L – parts per billion

I have enclosed a copy of the Health Risk Evaluation prepared by Dr. Ken Rudo, of the Occupational and Environmental Epidemiology Branch of the Division of Public Health. If you have any questions, please contact me at the address or telephone number provided. Dr. Rudo can be reached at (919) 715-6430.

Sincerely,

Brad C. Newton, P.G.
Hydrogeologist II
Mooresville Regional Office

Attachments
cc: James Thompson – Gaston County Health Department
Bruce Parris - Aquifer Protection Section, MRO

NCDENR

North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor
William G. Ross Jr., Secretary

Division of Waste Management
Underground Storage Tank Section

Dexter R. Matthews, Director

April 14, 2005

Michael and Mary Cox
P.O. Box 383
Mount Holly, North Carolina 28120

RE: Sample Results
Cox Water Supply Well (WSW-2)
511 Flat Rock Cemetery Road
Mount Holly, Gaston County

Dear Mr. and Mrs. Cox:

On February 28, 2005, Froehling and Robertson, Inc. personnel, representatives of North Carolina Forest Service, sampled your water supply well. The sample was analyzed for volatile and semi-volatile organic compounds. Volatile and semi-volatile organic compounds include a wide range of manmade compounds including, but not limited to, gasoline components and chlorinated solvents used as degreasers. The February 28, 2005 sample detected 4-hydroxy-4methyl-2-pentanone, and acetic acid in the well water.

Laboratory results from these samples are summarized below. These results represent the conditions in your well at the time of sampling:

Compound	Concentration*	NC Maximum Allowable Concentration
1,2,3-trichloro-1-propene	21 ug/L	Laboratory Method Detection Limit
acetic acid	131 ug/L	Laboratory Method Detection Limit

*ug/L – parts per billion

I have forwarded a copy of the laboratory analytical report to Dr. Ken Rudo, of the Occupational and Environmental Epidemiology Branch of the Division of Public Health, and requested a Health Risk Evaluation. If you have any questions, please contact me at the address or telephone number provided. Dr. Rudo can be reached at (919) 715-6430.

Sincerely,

Brad C. Newton, P.G.
Hydrogeologist II
Mooresville Regional Office

Attachments

cc: James Thompson – Gaston County Health Department
Bruce Parris - Aquifer Protection Section, MRO

Click here to complete online then print

Site Cleanup Questionnaire

Remediating parties should prepare this form with the assistance of an environmental consultant. All cooperative parties are eligible for Branch-approved remedial actions. Answer all questions, based on current information, and provide written descriptions where needed.

NCDENR Site Name, City and County _____

		Circle One	
1.	Is the site located on or immediately adjacent to residential property, schools, day-care centers or other sensitive populations? If yes, please explain on a separate page.	Y	N
2.	What is the distance (from site property line) to the nearest residence, school or day-care center? Please attach a map showing the site and nearest residence, school or daycare center.	_____	
3.	Is the site completely surrounded by a locked fence? If no, please explain security measures at the site on a separate page.	Y	N
4.	Are site surface soils known to be contaminated? If yes, or unknown, describe briefly on a separate page.	Y	N
5.	Is site groundwater known to be contaminated? If yes, or unknown, describe briefly on a separate page.	Y	N
6.	Is site sediment or surface water known to be contaminated? If yes, or unknown, describe briefly on a separate page.	Y	N
7.	Has groundwater contamination affected any drinking water wells? If yes, or unknown, please explain on a separate page.	Y	N
8.	What is the distance to the nearest downgradient drinking water well?	_____	
9.	What is the distance to the nearest downstream surface water intake?	_____	
10.	Are hazardous vapors, air emissions or contaminated dust migrating into occupied residential, commercial or industrial areas? If yes, or unknown, please explain on a separate page.	Y	N
11.	Have hazardous substances known to have migrated off property at concentrations in excess of Branch unrestricted-use remediation goals? If yes, or unknown, please explain on a separate page.	Y	N
12.	Has the local community expressed concerns about contamination at the site? If yes, or unknown, please explain on a separate page.	Y	N
13.	Based on current information, are there any sensitive environments located on the property (sensitive environments are identified in the Remedial Investigation Work Plans section of the IHSB "Guidelines for Assessment and Cleanup"at www.wastenotnc.org/sfhome/stateleadguidance.pdf)?	Y	N

If yes, or unknown, please explain on a separate page.

14. Based on current information, has contamination from the site migrated into any sensitive environments? Y N

If yes, or unknown, please explain on a separate page.

15. Do site contaminants include radioactive or mixed radioactive and chemical wastes? Y N

If yes, or unknown, please explain on a separate page.

Remediating Party Certification Statement

I hereby certify that the responses provided above are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.

_____ _____

(Signature of Remediating Party Representative) (Date)

_____

(Printed Name and Title of Remediating Party Representative)

_____

(Printed Name of Company)

_____

(State in which signature is witnessed)

_____ County

I, _____, a Notary Public of said County and State, do hereby certify that _____ did personally appear and sign before me this the _____ day of _____, _____.

_____

Notary Public (signature)

(OFFICIAL SEAL)

My commission expires:

_____

Environmental Consultant Certification Statement

I hereby certify that the responses provided above are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.

_____ _____

(Signature) (Date)

_____

(Printed Name)

_____

(Printed Name of Environmental Consultant)

_____

(State in which signature is witnessed)

_____ County

I, _____, a Notary Public of said County and State, do hereby certify that _____ did personally appear and sign before me this the _____ day of _____, _____.

_____

Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: _____

North Carolina Department of Environment and Natural Resources
Dexter R. Matthews, Director | Division of Waste Management | Michael F. Easley, Governor
William G. Ross Jr., Secretary

April 28, 2008

Mr. Allen Williams
NCDENR, Division of Forest Resources
P.O. Box 29581
Raleigh, NC 27626-0581

Re: **NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT AND CLEANUP**

District 12 Headquarters
NC Highway 273, Gaston County, NC

Dear Mr. Williams:

We have received information from the Underground Storage Tank Section, which indicates that several water supply wells located near your site may have been impacted by one or more hazardous substances. If those hazardous substances originated from your site, you will be required to assess and cleanup the contamination under one or more cleanup authorities. Regulatory oversight for the assessment and cleanup under all applicable authorities will be provided by the Division of Waste Management through its Superfund Section, Inactive Hazardous Sites Branch ("Branch").

Based on information provided to date, the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310, et seq., applies to your site. In addition, initial immediate actions may be required under 15A NCAC 2L, Groundwater Classifications and Standards.

I. ACTIONS REQUIRED AT THIS TIME:

Complete the Site Cleanup Questionnaire.
To comply with the requirements of State law, a Site Cleanup Questionnaire, available on the website noted at the end of this letter, must be completed and returned to this office. The information you provide will be reviewed along with other information to prioritize the site, so please make certain that the information you provide is complete and accurate. Please note that your failure to inform the Branch of any nearby potable wells or other high risk conditions may adversely affect the Branch's ability to identify this site as a higher-risk site.

Take Initial Abatement Actions Required Under 15A NCAC 2L.
If you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards

resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the IHSRA.

II. FUTURE ASSESSMENT AND CLEANUP ACTIVITIES:

All correspondence regarding this site should be sent to the Branch. Future assessment and cleanup activities (activities conducted after the initial abatement steps required in 15A NCAC 2L) may be conducted through the Voluntary Cleanup Program (discussed below) or pursuant to an Order issued under N.C. Gen. Stat. § 130A-310.3. In addition, if you choose not to conduct a cleanup through the Voluntary Cleanup Program, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

III. VOLUNTARY CLEANUP PROGRAM:

Under the IHSRA, persons who move forward to assess and remediate contamination, without being compelled to do so through formal legal action filed against them, are called "volunteers." To participate in the voluntary cleanup program, you will be required to enter into an administrative agreement with the Branch. The voluntary cleanup will proceed through the Registered Environmental Consultant Program or under direct oversight by the Branch Staff, as discussed below:

Agreement to Conduct Assessment and Remediation Through the Registered Environmental Consultant Program.

The Branch has a privatized oversight arm of the voluntary cleanup program known as the Registered Environmental Consultant ("REC") program. Based on the responses provided on the questionnaire (degree of hazard and public interest in the site), the Branch will determine whether a staff person or an REC will perform the oversight and approval of your assessment and cleanup action. Please note that having one or more of the conditions identified on the questionnaire does not necessarily preclude the site for qualifying for an REC-directed cleanup action.

Under the REC program, the volunteer hires an environmental consulting firm, which the State has approved as having met certain qualifications, to implement a cleanup and certify that the work is being performed in compliance with regulations. In other words, the REC's certifications of compliance are in place of direct oversight by the Branch. Details of the REC program can be found at http://www.wastenotnc.org/sfhome/recprog.htm. If you have any questions specific to the REC Program, including how to participate, please contact the REC Program Manager, Kim Caulk, at (919) 508-8451.

Agreement to Conduct Assessment and Remediation Under State Oversight.

If the Branch determines that the site should be assessed and remediated pursuant to direct State oversight, it will not be eligible for a REC-directed cleanup. Rather, the remedial action will receive direct oversight by Branch staff.

IV. FAILURE TO RESPOND:

If we do not receive a completed questionnaire, the Branch will take further action to prioritize the site without your input. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek an injunction compelling compliance with the initial abatement steps required in 15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to § 130A-310.3 to compel assessment and cleanup.

V. ADDITIONAL INFORMATION REGARDING THE IHSRA AND THE BRANCH:

People are often confused by the name of the Inactive Hazardous Sites Response Act and the Branch. By definition, "Inactive Hazardous Sites" are any areas where hazardous substances have come to be located and would include active and inactive facilities and a variety of property types. The term "inactive" simply refers to the fact that cleanup was inactive at large numbers of sites at the time of program enactment. Additional information about the Branch may be found at http://www.wastenotnc.org/sfhome/ihsbrnch.htm.

Submit completed questionnaire to:

Bruce E. Lefler, Jr.
Inactive Hazardous Sites Branch
401 Oberlin Road, Suite 150
1646 Mail Service Center
Raleigh, NC 27699-1646

If you have additional questions about the requirements that apply to your site, please contact me at (919) 508-8463.

Sincerely,

Bruce E. Lefler, Jr., Hydrogeologist
Inactive Hazardous Sites Branch
Superfund Section